

MEMO ENDORSED

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

VERTIME B.V.,
Plaintiff/Counterclaim-Defendant,

v.

NEW DOVER GROUP, LTD.,
Defendant/Counterclaim-Plaintiff

No. 7:17-cv-03844 (KMK)

PROPOSED SCHEDULING ORDER

In accordance with the order of the Court [Doc. No. 71], plaintiff/counterclaim-defendant Vertime B. V. and defendant/counterclaim-plaintiff New Dover Group, Ltd., hereby propose the following Scheduling Order for the conduct of discovery in this case:

Fact Discovery Completed By:

July 1, 2018
~~October 1, 2018~~

Written Discovery Propounded by: March 15, 2018

Written Responses by:

April 15
~~May 15, 2018~~

Time to resolve objections/motions: ~~August 15, 2018~~

Plaintiff's Experts Disclosed By:

August
~~November 1, 2018~~

Plaintiff's Experts Deposed By:

September
~~December 1, 2018~~

Defendant's Experts Disclosed By:

October 1
~~January 15, 2018~~

Defendant's Experts Deposed By:

November 1
~~February 15, 2018~~

November 2, 2018, at 2:00

CASE Management Conference

*Morant's pre-motion letter
due 2 weeks before the
conference*

*Non-morant's response is due
1 week before the
next conference*

**PLAINTIFF/COUNTERCLAIM-DEFENDANT,
VERTIME B.V.**

Dated: February 15, 2018

By: /s/ Todd R. Michaelis (TM6839)
Ann H. Rubin (*pro hac vice*)
Todd R. Michaelis (TM6839)
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CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that, on February 15, 2018, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing. Parties may access this filing through the court's CM/ECF System.

/s/ Todd R. Michaelis (TM6839)
Todd R Michaelis

So Ordered
MK
2/26/18